

workflow, Berg does not in any way compute all of the possible paths, including parallel paths, and combinations and determine the minimum time and critical path through the tasks as provided by a PERT like function. Column 11 lines 43-57 describe the application of Boolean conditions to initiate a step. While Berg provides conditions to initiate each step, Berg does not provide the PERT like determination of all possible paths for the critical path or the re-planning functions. Column 22 lines 47-59 describe the collection of historical data for comparison of planned vs. actual and the ability to export this information to "project management systems as Microsoft Project, Mac Project, and Auto Plan II". Berg refers to itself as a "workflow" and never asserts project management functions.

3) While Berg discloses exporting planned vs. actual data to a project management system, Berg does not disclose the importing of the task relationships in the project management system so that task can be related to workflows such that the completion of a workflow represents the completion of a task and the interconnection of workflows is determined by the interconnection of tasks.


4) Berg is a workflow system that controls the sequencing and initiation of complex program tasks. The Berg routes provide for conditional branching based on the results of the execution of the program tasks. As a workflow system, Berg can track the completion of route steps and estimate the remaining time based on estimated duration of each step in the sequential route. However, Berg provides no discussion of PERT like functions which identify the critical path through a set of tasks where tasks may execute in parallel and task initiation is not a linear sequence. Berg does not discuss re-planning where tasks may be re-ordered to minimize the impact of differences between the estimated duration and actual durations or the addition or deletion or modification of tasks.

5) Berg is NOT an integrated workflow / project management system.

Claims are grouped 41-47, 48-54, 55-60 where claims 41, 48, and 55 are independent claims.

The inventor will gladly send this response as a Microsoft Word document. Please send an e-mail to [Ken.Ouchi@Avidtecs.com](mailto:Ken.Ouchi@Avidtecs.com) and an e-mail with the attached file will be returned.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Norm Ken Ouchi", written in a cursive style.

Norman Ken Ouchi

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